

**From:** [Poentis, Kris T](#)  
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**Cc:** [Lum, Darryl C](#)  
**Subject:** FW: Kailua Regional WWTP  
**Date:** Friday, January 25, 2013 1:53:35 PM

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Hi Dan,

The following are my comments on the draft permit and fact sheet. As for the highlighted portions, I'm not sure what we should do. Can you include your recommendations in the permit and maybe we can discuss with Darryl via teleconference? Thanks!

Kris

#### Draft Permit Comments:

1. Part A.1 – Turbidity Limit - ???
2. Part D – ZOM Limits – how is Geo Mean evaluated? By Calendar year? There is no monitoring frequency so no monitoring required at the boundaries of the ZOM?
3. Part E.1 – Enterococci test procedures – do not include to be consistent with Sand Island and Honouliuli
4. Part E.2 – Nearshore Water Quality Monitoring. The monitoring locations should be within 300 m from shore. I think for Waianae WWTP, the permit required the City to monitor at 300 m, but we allowed them to sample a little more offshore because they said that the area at 300 m was too rough to sample. But, when they showed exceedance, they said that it didn't count since they were outside of the 300 m. Tricky!
5. Part E.3 – I think we included the EPA entero requirement (35 cfu geomean )at the ZOM because it is outside of Hawaii's criteria and to make it easier to sample for the City. We the ZOM Since entero requirements outside of the 300 m is not formally adopted in our rules, would we be able to use it? I don't believe we included any ZID monitoring in the previous permit.
6. Part F – Wastewater Pollution Prevention Program – check if they initiated any contingency plans or was granted exemption?
7. Part H.1.b(c) – Monitoring Requirements for Sludge that is Land-Applied – replace entire section with **"The Permittee shall obtain and comply with the Wastewater Management Individual Permit, issued by the DOH, Wastewater Branch."**
8. Part H.1.e – Requirements for Sludge that is land-Applied – replace entire section with **"The Permittee shall obtain and comply with the Wastewater Management Individual Permit, issued by the DOH, Wastewater Branch."**
9. Part I.1.c(6) – not sure. Historically this condition has not been in Waianae or Kailua Regional.

#### Draft Fact Sheet Comments

1. Page 4 – Administrative extension was granted on June 30, 2009.
2. C.1 – most recent HAR Chapter 11-54 amendment is October 11, 2012.
3. C.2 – most recent HAR Chapter 11-55 amendment is October 11, 2012.

4. D.2.I – Summary of Final Effluent Limitations – 12.7 MGD was used for the calculation of the mass-based limitations because they did not provide a new antidegradation study when the plant was upgraded.
5. F.4.b – Nearshore Water Quality Monitoring - stations should be within 300 meters from shore for compliance purposes.
6. F.4.b (should be F.4.c) – Zone of Initial Dilution Water Quality Monitoring – see Draft Permit Comment #5 above.